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0011366

October 15, 1990

Meeting Minutes Transmittal/Approval
Unit Managers Meeting: Past Practices General Topics
Federal Building, Room G-59
Richland, Washington
September 19, 1990

From/
Appvl.: Robert K. Stewart Date: 10/16/90
Robert K. Stewart, R.I. Coordinator, DOE-RL (A6-95)

Appvl.: Douglas R. Sherwood Date: 10/16/90
Douglas R. Sherwood, Representative, EPA (B5-01)

Appvl.: L Goldstein Date 10/16/90
Larry Goldstein, CERCLA Unit Supervisor, Washington Dept. of Ecology

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The purpose of this meeting was to discuss general topics which are common to all operable units.

Meeting Minutes are attached. Minutes are comprised of the following:

Attachment #1 - Meeting Summary/Summary of Commitments and Agreements
Attachment #2 - Agenda for the meeting
Attachment #3 - Attendance List
Attachment #4 - Action Items Status List
Attachment #5 - Administrative Record File Status Chart
Attachment #6 - Draft EII 4.3 - Control of CERCLA and other Past-Practice Waste Site Waste
Attachment #7 - Overview of EII 4.3
Attachment #8 - ERD Surveillance - Consistency in Remedial Investigation/Feasibility Study Work Plans & Work Plan Implementation
Attachment #9 - HEIS Development and Operations
Attachment #10 - Notes on the Presentation on the Quality Assurance Requirements Document

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Prepared by: Doug Fassett Date: 10/16/90
SWEC GSSC

Concurrence by: J.M. Wintczak Date: 10/16/90
WHC ER Programs

Distribution:

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R.O. Patt, Oregon Water Resources Dept.

Ward Staubitz, USGS
Donna Lacombe, PRC
Doug Fassett, SWEC (A4-35)

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Mary Harmon, DOE-HQ (EM-442)
Paul Pak, DOE-RL (A6-95)
Jim Rasmussen, DOE-RL (A6-95)
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Mike Thompson, DOE-RL (A6-95)
S.H. Wisness, DOE-RL (A6-95)
J.M. Hennig, DOE-RL (A5-21)

John Stewart, USACE

Melvin Adams, WHC (H4-55)
Frank Calipristi, WHC (B2-35)
Steve Clark, WHC (H4-55)
Larry Hulstrom WHC (H4-55)
Wayne Johnson, WHC (H4-55)
Alan Krug, WHC (H4-55)
Merl Lauterbach, WHC (H4-55)
Fred Roeck, WHC (H4-55)
KaeRae Parnell, WHC (H4-18)
Jim Patterson, WHC (B2-15)
Steve Weiss, WHC (H4-55)
Tom Wintczak, WHC (B2-15)
R.D. Wojtasek, WHC (B2-15)

Don Kane, EMO (K1-74)
Terri Stewart, PNL (K2-12)
Michael A. Neely, PNL (K6-96)

ADMINISTRATIVE RECORDS: 1100-EM-1, 300-FF-1, 300-FF-5, 200-BP-1, 100-HR-1, 100-HR-3, 100-BC-1, 100-BC-5, 100-NR-1, 100-NR-3; Care of Susan Wray, WHC (H4-51C)
Please inform Doug Fassett (SWEC) of deletions or additions to the distribution list.

Attachment #1

Meeting Summary and Summary of Commitments and Agreements
General Topics Unit Managers Meeting
Federal Building, Room G-59
September 19, 1990

Meeting Summary/Summary of Commitments and Agreements

1. Bob Stewart (DOE-RL) opened the meeting. The next Unit Managers Meeting was scheduled for October 16 and 17, 1990. The CERCLA UMMs were scheduled through the end of this calendar year. The November meeting will be held November 14 and 15, 1990 and the December meeting will be held December 18 and 19, 1990.

2. Doug Fassett (SWEC) circulated the General Topics minutes from the July 17, 1990, meeting for approval and signature. Changes to the meetings after the review cycle were described, the minutes were approved and signed.

3. EPA announced that they will be closed, because of budget restraints, for one half day on October 3 and on October 4, and 5. Furloughs may take place if congress fails to agree on the budget for FY 1991 by Oct. 1.

4. Brian Sprouse (WHC) presented the Administrative Record overview. 100 NR-1 and -3 were added to the AR File Status Chart (see Attachment #5). An AR index will be out next month. 90% of the present AR has been microfilmed. The microfilm will be distributed to records centers upon completion. The new AR material will be microfilmed every six months. It was agreed that an AR update was only needed on a quarterly basis as suggested by Jim Patterson (WHC).

5. USACE reviewed the anticipated transition of responsibilities. The Corps expects to take over administration of the 1100-EM-1 unit on October 1st. The Corps anticipates no slippage in schedule during the transition from WHC to USACE. To facilitate the transition, WHC will continue to work on the RI Phase II report with USACE working on the comment responses and resolutions in the first quarter, fiscal year 1991. USACE anticipates supporting groundwater monitor well survey work in fiscal year 1991. USACE expects to have a total of 4-6 people present in the program office on site.

6. The procedure on RI/FS Characterization Waste was introduced by Bob Stewart. The draft EII 5.3, "Control of CERCLA and Other Past Practice Waste Site Waste" was given to EPA and Ecology (see Attachment #6). Ed Smith (WHC) gave an overview on the draft EII (See Attachment #7). Doug Sherwood (EPA) stated that the CSSI may be in violation of TSD regulations.

ACTION ITEM #GT.66: Prepare a justification of the rationale for the changes in EII 4.3 to be submitted to EPA and Ecology by October 1st. EPA and Ecology will review the EII once they have received the justification. Action: Ed Smith (WHC)/Kathy Davis (SWEC)

7. Bob Stewart distributed a surveillance report on work plan consistency to the regulators (see Attachment #8). WHC is taking actions to implement suggestions made by Ward Staubitz during his presentation on work plan consistency.

8. Tom Wintczak commented on the budgetary planning for fiscal year 1991. Cost estimates have been prepared for 100-HR-1, 100-HR-3, 100-DR-1 RFI/CMS Work Plan Implementation. DOE-RL requested a meeting which is set for September 25, 1990, with the regulators to discuss these costs prior to submitting the final Work Plan drafts.

   A cost estimate model is being prepared. A review team will verify the model and the cost estimates in the model. A cost estimating system that will allow comparison of the different DOE facilities will be implemented. The goal is that by the end of the calendar year cost estimates for RI/FS will be prepared.

9. Tom Wintczak led a discussion on the impact of the Bush budget on planning and scoping of work for FY91. The schedule and workscope have been affected by the possible sequestering of funds. A meeting was set up with WHC and the regulators to discuss the priority of workplans and work such as groundwater wells previously planned. This meeting will take place September 25, 1990.

10. Bob Henckel gave an update on the HEIS (see Attachment #9). There has been a problem funding adequate maps for the Geographic Information System (GIS). There is still no overall site map. The USACE has provided input on their needs for an overall site map. Ward Staubitz (USGS) stated that there is a need to use existing data from existing wells. A base map is needed to make use of the data in the GIS. DOE-RL is developing a task order to have the USACE survey existing monitoring wells.

ACTION ITEM #GT.67: USGS to provide input on requirements for a base map that is compatible with ARC-info for site-wide coverage. Action: Ward Staubitz

10. Mike Thompson (DOE) described his meeting with EPA and Ecology on the RI/FS Streamlinig Strategy. The revised streamlining strategy will include the option to perform an expedited remedial action. It will be available today (9/19/90). This item will be on the agenda for next month's general topics unit manager's meeting.

11. Ron Cote' from the ER Program Office gave a presentation on the Quality Assurance Requirements Document (QARD)(see Attachment #10). This document in draft form is undergoing a second round of reviews. The QARD should

not have a major impact on the Quality Assurance Project Plans (QAPPs) if they have been completed using the requirements from DQO and QAMS 005. It is expected that the QARD will be revised annually or when significant changes to pertinent documents, such as the Tri-Party Agreement, occur.

ACTION ITEM #GT.68: A training plan on the QARD will be developed and shared with the regulators for their review. Action: Ron Cote'

Attachment #2

General Topics Unit Managers Meeting Agenda
August 15, 1990
Federal Building, Room G-59

General Topics

9:00 - 10:00

Approval of July's Unit Managers Meeting Minutes - Doug Fassett

Administrative Record Review - Brian Sprouse

ACE Transition - Bob Stewart, DOE-RL/John Stewart, USACE

Procedure on RI/FS Characterization Waste - Bob Stewart

RI/FS Work Plan Consistency Actions - Bob Stewart

Discussion of RI/FS Cost Model/Cost Update - Tom Wintczak

FY 1991 Planning - Tom Wintczak

10:00 - 11:00

HEIS Update - Bob Henckel

11:00 - 11:30

RI/FS Streamlining Strategy - Mike Thompson

11:30 - 12:00

Quality Assurance Requirements Document (QARD) - Ron Cote'

12:00 - 1:00

Lunch

1:00 - 1:30

Action Item Status - Doug Fassett

October Agenda - Bob Stewart

Attachment #3

Attendance List
General Topics Unit Managers Meeting
August 15, 1990

Name	Org.	O.U.	Phone
Erickson, Julie	DOE-RL		(509) 376-3603
Hildebrand, R. Douglas	DOE-RL		(509) 376-7287
Hudson, Rich	DOE-RL	Program Mgmt	(509) 376-7044
Pak, Paul	DOE-RL	100-NR	(509) 376-4798
Rasmussen, James E.	DOE-RL		(509) 376-2247
Stewart, Robert K.	DOE-RL	1100-EM-1	(509) 376-6192
Thompson, K. Michael	DOE-RL	Groundwater	(509) 376-6421
Werdel, Nancy A.	DOE-RL		(509) 376-5500
Cline, Chuck	Ecology	CERCLA Unit	(206) 438-7556
Cross, Steve	Ecology	CERCLA Unit	(206) 458-6675
Goldstein, Larry	Ecology	CERCLA Unit	(206) 438-7018
Kane, Don	EMO/PLN	RI/FS	(509) 376-0259
Neely, Mike	EMO		(509) 376-5056
Sherwood, Doug	EPA		(509) 376-9529
LaCombe, Donna	PRC	EPA Cont.	(206) 624-2692
Davis, Kathy	SWEC	GSSC to DOE-RL	(509) 376-0412
Fassett, Doug	SWEC	GSSC to DOE-RL	(509) 376-9969
Miklavcic, Fred J.	USACE	Ad. Ch. EE Branch	(509) 522-6763
Stewart, John	USACE	1100-EM-1	(509) 522-6531
Drost, Brian	USGS	EPA Support	(206) 593-6510
Staubitz, Ward	USGS	EPA Support	(206) 593-6870
Fones, Greg	MacTec	QARD Development	(509) 946-0176
Swatek, Robert W.	MacTec	QARD Development	(509) 946-0176
Ayres, Jeff	WHC	100-HR-1	(509) 376-3918
Green, Bill	WHC	100-NR-3	(509) 376-3886
Hoover, James D.	WHC		(509) 376-2668
Hulstrom, Larry	WHC	300FF-1,-5 Coord.	(509) 376-4034
Henckel, Robert P	WHC	HEIS	(509) 376-2091
Krug, Alan	WHC	100-HR-1	(509) 376-5634
Lauterbach, Merle	WHC	Env. Eng.	(509) 376-5257
Patterson, Jim	WHC		(509) 376-0902
Weiss, Steve	WHC	100-DR-1, BC-1,	(509) 376-1683
Wintczak, Tom	WHC		(509) 376-0902

Attachment #4
Action Items Status List
General Topics Meeting
July 17, 1990

Item No.	Action/Source of Action	Status
ST1.6	EPA and Ecology requested that they be supplied with the report documenting the results of the Becker drilling and containment system test. W.H. Price (WHC) will supply a copy of the report for EPA and Ecology's on-site review. After clearance, copies of the report will be provided.	Open It is anticipated that the report will be cleared and issued by the end of September 1990. Regulators will be provided a copy at that time. (9/19/90)
GT.18	WHC will develop a small team for the purpose of developing a Hanford-specific work plan preparation guide guidance document. The committee is to include members from EPA/Ecology, SWEC/IT, and PNL/EMO as well as WHC. Action: Tom Wintczak (1/24/90, GT-UMM)	Open Deferred pending closure of streamlining issue. (6/12/90) The Lessons Learned document will be integrated into this document. (7/17/90) Deferred pending closure of the streamlining issue. (9/19/90)
GT.30	Within two weeks of delivery of the narrative (per GT.29) to EPA and Ecology, Ecology will provide suggestions for the integration of RCRA TSD activities into that strategy. Action: T. Michelena/ L. Goldstein, Ecology (3/20/90, GT-UMM)	Open May 8, 1990 meeting, 9:00 AM at 450 Hill St., Room 35 - this meeting helped but further discussion on this issue is necessary. (6/12/90) Mike Thompson has revised the strategy to incorporate EPA-HQ and DOE-HQ input. Ecology and EPA will be asked to review the revised strategy and incorporate TSD considerations. (7/17/90) Ecology's additional comments to be incorporated in most recent revision. (9/19/90)

GT.31	DOE/WHC is to develop an implementation plan for the strategy associated with the logic diagram on source/groundwater operable unit integration and streamlining. This plan is to include schedule and budget impacts associated with implementation. Action: K.M. Thompson, (3/20/90, GT-UMM)	Open Per Mike Thompson, the action parties are trying to pull the implementation discussion together. A meeting will be scheduled by 9/24/90 (9/19/90).
GT.38	If possible, at the May Unit Managers Meeting a presentation on the approved, preferred alternative method for disposal of the reactors will be given. Action: Jim Goodenough (4/18/90, GT-UMM)	Open The final disposal decision (proposed action) has not yet been made. A presentation will be made to the Unit Managers at the earliest meeting following formalization of the proposed action. (9/19/90)
GT.43	A follow up meeting will be scheduled with EPA, Ecology, DOE and WHC to discuss the apparent conflicts between NEPA and RCRA/CERCLA activities. Action: Julie Erickson/Paul Dunigan (4/18/90, GT-UMM)	Open Headquarters is working on draft guidance for EA and Phase III Feasibility Study to be incorporated into one document. Julie Erickson will set up a meeting when guidance has been received.
GT.48	WHC to ascertain if a report or an update on the Becker drilling program is appropriate for the July or August UMM. Action: Don Moak/Jim Patterson (5/16/90, GT-UMM)	Open This item will be placed on the agenda for October. Don Moak will make the presentation. (9/19/90)
GT.49	The plan for the Background Strategy is to be delivered to DOE for review by June 1990. This plan is to include a brief discussion of estimated costs and associated schedules for determining background in both media. Action: Jim Hoover, WHC (5/16/90, GT-UMM)	Open Jim Patterson reported that this item is on schedule and that Jim Hoover expects to have it complete by the end of September. (9/19/90)

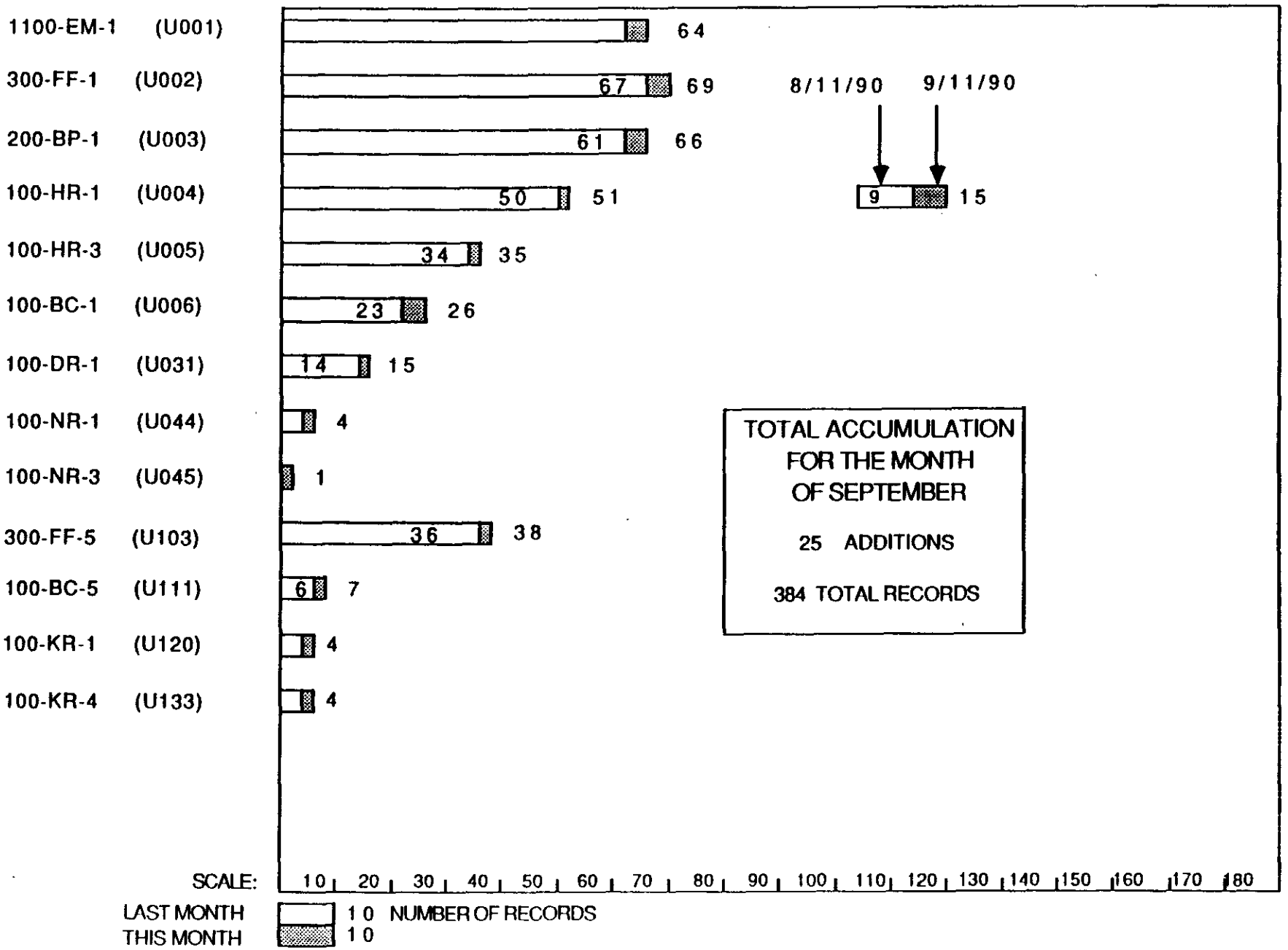
GT.51	A committee will be formed over the next several weeks to develop and propose an alternative procedure for RI/FS (RFI/CMS) characterization generated waste. Action: Bob Stewart (5/16/90, GT-UMM)	Closed The draft waste handling procedure was presented to the regulators at the September UMM. (9/19/90)
GT.55	Provide information on the conversion of all Hanford data to the GIS coordinate system. Action: Larry Brown and Bob Henckel	Open The best method of presenting the data on the GIS system is being discussed. Ward Staubitz and Chuck Cline will follow up with WHC. (7/17/90) Rich Hudson reported that there needs to be additional coordination between KEH, WHC and USACE on this item. WHC will establish what is needed. (9/19/90)
GT.57	Determine what parts of ENCORE are funded and will be completed. Action: Jim Patterson	Open $ 900K has been allocated for the total ENCORE program. The scope of work is still being negotiated. This includes IRM, systems, plans and many other items. Ecology stated the funding appears excessive in view of projected short-fall in near-future. EPA and Ecology need to be involved in setting priorities. (9/19/90).
GT.58	DOE will expedite completion of the integration and Lessons Learned documents so that it will be available for all involved parties. Action: Bob Stewart.	Open. This Item was previously labeled HR1.18. (6/12/90) Comments have been received and they will be compiled. (7/17/90) Action has been delayed because of other required activities. (9/19/90)

GT.60	Plan a technical session with participation by WHC and PNL to address proper techniques of characterization of soil hydraulic properties and application of unsaturated flow and solute transport models for the RI/FS Workplans. Include Ward Staubitz and Chuck Cline and others as needed. Action: Jerry Cammann (7/17/90, GT.UMM)	Open Jerry Camman is planning a one-day session next month near the date of the Unit Managers Meeting for October (9/19/90).
GT.61	Develop a response to the presentation on Consistency Problems. Action: B. Stewart/ K. M. Thompson (8/15/90, GT.UMM)	Closed A surveillance was conducted on 8/29/90 to assess WHC responses to the workplan consistency issue. Copies will be provided at the 9/19/90 GT-UMM. Per Doug Sherwood, the response meets the need for now. This item can be closed. (9/19/90)
GT.62	Negotiate an agreement, with all parties concerned, on the Streamlining Strategy. Develop an implementation plan by September. Action: M. Thompson (8/15/90, GT.UMM)	Closed This item is covered by Action Items GT.31 and GT.58 (9/19/90)
GT.63	WHC to draft a letter for DOE to send to EPA and Ecology proposing to treat the 200-UP-2/200W Area and the Associated Groundwater contamination as an AAMS. Action W. L. Johnson (8/15/90, GT.UMM)	Open No Change (9/19/90).
GT.64	DOE will respond to Ecology's question on funding for FY 92 for the installation of new groundwater monitoring wells to develop background information. Action: M. Thompson/J. Patterson (8/15/90, GT.UMM)	Closed $500K in the EK account is proposed for groundwater monitoring wells in FY 92. (9/19/90).

GT.65	Determine the appropriate Timing for tasking USACE to proceed with the monitor well survey for the GIS. Action: K. M. Thompson/R. Hudson/USACE (8/15/90, GT.UMM)	Closed (8/15/90) A meeting is scheduled for the first week in October to discuss this item. (9/19/90).
GT.66	Write a justification of the rationale for the changes in EII 4.3 to be submitted to EPA and Ecology by October 1st. Action: Ed Smith (WHC)/Kathy Davis (SWEC). (9/19/90, GT.UMM)	Open.
GT.67	USGS to provide input on requirements for a base map that is compatible with ARC-Info for site-wide coverage. Action: Ward Staubitz (9/19/90 GT.UMM)	~~Open~~ Closed Letter from [illegible] to M Thompson [illegible]
GT.68	A training plan on the QARD will be developed and shared with the regulators for their review. Action: Ron Cote' (9/19/90 GT.UMM)	Open

ENVIRONMENTAL DATA MANAGEMENT CENTER
ADMINISTRATIVE RECORD FILE STATUS CHART

AS OF 09/10/90



WESTINGHOUSE HANFORD COMPANY

ENVIRONMENTAL INVESTIGATIONS AND SITE CHARACTERIZATION MANUAL

Manual WHC-CM-7-7
Section EII 4.3, Rev.0
Page 1 of 16
Effective Date
Organization ENV/Environmental Engineering, Technology and Permitting

DRAFT

TITLE:

CONTROL OF CERCLA AND OTHER PAST PRACTICE WASTE SITE WASTE

Approved by

L. C. Brown, Manager
Environmental Engineering, Technology and Permitting

1.0 PURPOSE

This Environmental Investigations Instruction (EII) establishes a system to control the containment, labeling, and tracking of waste generated during Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and other past practice waste site environmental investigation, site characterization, and well maintenance activities.

2.0 SCOPE

This EII applies to all Environmental Engineering, Technology & Permitting (EET&P) personnel and subcontractors generating waste during CERCLA and other past practice waste site environmental investigation, site characterization, and well maintenance activities. This EII governs the handling and storage of wastes unless otherwise specified in working/planning documents approved by the U.S. Department of Energy (DOE) and regulatory agencies.

3.0 DEFINITIONS

Accumulation Start Date. For the purpose of this EII, accumulation start date is the day a CERCLA, or other past practice waste site waste, is removed from the operable unit where generated (for solid waste) or the Centralized Liquid Waste Container Storage Area (for liquid waste). At that point, the waste is treated as RCRA waste (EII 4.2, "Control of RCRA Waste").

Centralized Liquid Waste Container Storage Area. A centralized location within the boundaries of the Hanford facility where investigative and well maintenance liquid waste, generated from CERCLA, or other past practice site activities, is stored until remedial action begins for that operable unit from which the liquid waste was generated. This liquid waste storage area will provide appropriate containment, run-on/run-off control, aisle space, and protection from freezing.

Facility Generator. Individual who is responsible for the proper tracking, handling, and storage of waste.

Generated Waste. Waste, other than purge water (as defined in purge water document 90-ERB-073), that exists as a result of active field characterization or well maintenance activities.

Hazardous Waste. Nonradioactive solid waste that meets the criteria specified for hazardous waste as defined in 40 CFR, Part 261.3. or dangerous waste as defined in WAC 173-303.

Mixed Waste. Radioactive waste that meets the criteria for a hazardous or dangerous waste.

Process Knowledge. A scientific determination, based on the examination of available types of published data that would lead a scientist or engineer to believe there is a strong probability that hazardous waste exist at a site or area. Examples of published data that may provide site specific information include, but are not limited to:

1. Previous chemical or biological discharges
2. Soil or water analysis results
3. Scoping study results (i.e., soil gas measurements, air measurements, walking reconnaissances, geophysical studies)
4. Operations reports
5. Unplanned events or accident reports
6. Drawings or other documents

NOTE: The Waste Information Data System (WIDS) is a source of this information.

Project Coordinator. Individual assigned to coordinate sampling and analysis activities for CERCLA characterization sampling within the EET&P Function.

Radioactive Waste. Solid, liquid, or gaseous material that contains radionuclides regulated under the Atomic Energy Act of 1954, as amended, and of negligible economic value considering costs of recovery (WHC-CM-7-5).

Solid Waste Container Storage Area. A location within the boundaries of the operable unit where investigative and well maintenance solid waste generated from that operable unit is stored until remedial action begins. The boundaries of the storage area will be roped and identified with signs. Tape, pallets, and salvage drums will be available at the storage area.

Suspected Hazardous Waste. Nonradioactive solid waste that meets the criteria for Suspected Hazardous Waste as defined in Section 6.4 of this instruction.

Suspected Mixed Waste. Radioactive solid waste that meets the criteria for Suspected Hazardous Waste as defined in Section 6.4 of this instruction.

Waste Management. For the purpose of this document, management means the generation, characterization (analysis), storage, surveillance, record keeping, and reporting of CERCLA, or other past practice waste site waste.

Unknown Waste. Drill cuttings; decontamination fluids, materials, cloths, wipes, and wash water; grab samples, and well maintenance soils/slurries from a hazardous waste site having no indications from initial field investigations that hazardous or radioactive material is present at the time of placement within the drum.

Unknown waste containers are those with known physical (not chemical) contents; differentiating from unfamiliar containers with unknown physical and chemical contents, such as ones found at abandoned waste sites.

Waste. Material that is discarded, abandoned, inherently waste-like or not exempted by regulations.

Waste Site. Any facility or location where waste was disposed. These sites may include burial grounds, cribs, ditches, ponds, tanks, storage facilities, and other units used for the intentional or unintentional disposal or management of wastes (WHC-CM-7-5). Utilizing process knowledge, the project coordinator will determine, on a case-by-case basis, waste site boundaries within an operable unit. Activities within the boundaries of a waste site will be governed by the site specific hazardous waste operations permit (HWOP).

4.0 RESPONSIBILITIES

4.1 ENVIRONMENTAL ENGINEERING, TECHNOLOGY & PERMITTING FUNCTION MANAGER

The EET&P Function manager shall:

1. Assign/identify FGs and project coordinators within the EET&P Function;

2. Train all staff who generate waste to procedural requirements outlined in EII 4.2, WHC-CM-5-16, WHC-EP-0063-1, and this instruction;

3. Ensure activity specific waste minimization is implemented in field operations; and

4. Assign an EET&P point of contact to issue all unique container numbers to the FG(s) within the Function.

4.2 PROJECT COORDINATOR

The project coordinator for characterization activities shall determine the waste site boundary within an operable unit. The project coordinator shall also ensure that validated sample analyses are submitted to the FG within five working days of receiving the data.

4.3 FIELD TEAM LEADER/COGNIZANT ENGINEER

The field team leader/cognizant engineer (FTL/CE) shall:

1. Ensure drill cuttings and well maintenance soils/slurries are monitored in accordance with the HWOP or other governing safety documents;

2. Minimize waste by segregating drill cuttings and well maintenance soils/slurries based on field instrument readings;

3. Collect and containerize unknown, suspected hazardous, hazardous, radioactive, suspected mixed, and mixed waste;

4. Have adequate supplies (e.g. drums/containers, liners, markers, forms, labels) to handle anticipated needs (unknown, suspected hazardous, hazardous, radioactive, suspected mixed, or mixed waste);

5. Obtain unique container tracking numbers from the FG;

6. Fill out the Interim Control of Unknown, Suspected Hazardous and Mixed Waste form (IC Form)(Figure 1); secure it on the container, and submit the copy to the FG in accordance with section 6.6.4 of this instruction;

7. Move waste from the point of generation to the Solid Waste Container Storage Area or Centralized Liquid Waste Container Storage Area (as appropriate) during active field operations;

8. Set up container storage areas in accordance with section 3.0 of this instruction;

9. Periodically check drums at the Centralized Liquid Waste Container Storage Area and Solid Waste Container Storage Areas during active field operations (to assure IC Form is secure, all drums are accounted for and in good condition, etc.) and to notify the FG once active field operations have concluded; and

10. Coordinate with the health physics technician (HPT) on moving radioactive and mixed waste drums to a properly marked container storage area.

4.4 FACILITY GENERATOR

The FG shall:

1. Obtain unique container tracking numbers from the EET&P point of contact for the FTL/CE;

2. Review and sign the IC form provided by the FTL/CE and provide a copy to the project coordinator;

3. Enter, update and retrieve information using the generator waste tracking database for all containerized waste generated during environmental investigation, site characterization, and well maintenance activities;

4. Maintain a controlled logbook for use in the field to document container activity;

5. Maintain a file of the sample lab analysis for each sampled waste container;

6. Perform monthly inspections of Centralized Liquid Waste Container Storage Area and Solid Waste Container Storage Areas and complete the inspection logs;

7. Coordinate the storage and segregation of radioactive, hazardous, and mixed waste containers based on the sample lab analysis and in accordance with this instruction;

8. Maintain records documenting waste activity from generation through final destination in accordance with EII 1.6, "Records Management"

9. Report any deviations from normal operations to their cognizant manager.

4.5 ENVIRONMENTAL ENGINEERING, TECHNOLOGY AND PERMITTING POINT OF CONTACT

The point of contact shall:

1. Issue unique container tracking numbers to FG(s), and

2. Report the status of containers to the Function manager on a monthly basis.

5.0 REQUIREMENTS

5.1 CONTAINERS/LINERS (DRUMS/PLASTIC LINERS)

Until an alternate storage container can be identified and approved, the following DOT drums shall be used:

1. U.S. Department of Transportation (DOT) Specification 17-H, 17-C or 17-E drums shall be used to contain unknown, suspected hazardous, and hazardous waste. The 55-gallon drum size is generally used; however, 30-gallon, 85-gallon, and 110-gallon sizes in DOT specification 17-H and 17-C may be used for overpacking and salvage. Type 17-H or 17-C drums must have a gasket for the lid before containing wastes. Type 17-E drums must have a bung in good condition before containing decontamination fluids.

2. Drill cuttings should be packaged in a plastic bag at least 10 mil thick or other appropriate liner.

5.2 UNIQUE CONTAINER TRACKING NUMBER

The FG shall track containers of waste using the following numbering system. Unique container tracking numbers shall also be used to track laboratory samples that might be returned to the original site where generated.

```
XXXX-XX-XXX
 3   3   DD sequential container numbers (up to 6 digits)
 3   3
 3   @DDDDD year container filled
 3
 @DDDDDDDDD generating facility:
            ETEC designates Environmental Technology Group
            EENG designates Environmental Engineering Group
            GEOS designates Geosciences Group
            EFSG designates Environmental Field Services Group
            REGP designates Regulatory Permitting/NEPA
```

5.3 ENTRIES AND CORRECTIONS

All entries on the IC Form shall be entered in black indelible ink. Corrections shall be made by striking one line through the incorrect information, entering corrected data (when appropriate), initialing, and dating.

6.0 PROCEDURE

Material that is dry or moist (as defined in EII 9.1, "Geologic Logging") and originated above the water table shall not be contained if field analytical screening protocol (as identified in sections 6.4 and 6.5 of this procedure) detects no radioactive or hazardous waste and if there is no

process knowledge of hazardous or suspect hazardous waste. Such conditions shall be identified and included in sample and analysis plans or other appropriate documentation.

When unknown, suspected hazardous, hazardous, radioactive, suspected mixed, or mixed waste is placed in a waste container, the container shall be managed in accordance with this instruction.

All decontamination fluids shall be managed as either nonhazardous or unknown waste. Decontamination fluids shall be collected as unknown waste when: drilling in areas where purge water is required to be collected; soil/slurries/drill cuttings are collected as suspected hazardous waste, suspected mixed waste, or radioactive waste. Otherwise, decontamination fluids will be nonhazardous. Decontaminated fluids which are collected as unknown waste will be sampled and then managed in a manner similar to purge water (Sections 3.2.2 to 3.2.4 of the purge water document 90-ERB-073). Sampling of the decontaminated fluids will be limited to the constituents of concern, as identified from the soil/slurry sampling, the list of constituents for the purge water, or the constituent list obtained from process knowledge applied to the area. Nonhazardous decontamination fluids will be managed in the same manner as nonhazardous purge water (section 3.2.2 of purge water document 90-ERB-073). Materials (rags, personal protective equipment) shall be segregated with the waste it contacts. (Exception: materials contaminated with decon fluids are to be segregated and drummed in a container for solid waste.)

See Figure 3, "Generalized Diagram for Control of CERCLA or Other Past Practice Waste Site Waste."

6.1 CONTAINER PREPARATION

1. The entire container shall be checked for damage.

2. An appropriate liner should be inserted inside drum or container (optional).

3. The following should be legibly written on the lid with indelible black ink:

   a. Project name

   b. Borehole number

   c. Footage (enter footage intervals)

   d. Contents (enter contents of drum)

   e. Beginning date (enter date material first placed in drum)

   f. Date sealed (enter date material last placed in drum)

g. Unique container number (enter when sealed)

4. Secure IC Form to side of container (as required) in accordance with section 6.6.4 of this instruction.

6.2 MONITORING DRILL CUTTINGS AND WELL MAINTENANCE SOILS/SLURRIES

1. Drill cuttings/soils/slurries shall be monitored in accordance with applicable HWOP and/or radiation work permit.

2. A sample analysis request shall be prepared to accompany the sample(s) to the analytical facility to ensure that the correct analysis is performed. Some stationary analytical work can be eliminated by using an on-site mobile field screening facility. The Westinghouse Hanford Company (WHC) sample analysis request form (A-6000-406) is presented in EII 5.2, "Soil and Sediment Sampling." The project coordinator may choose to use a different form depending on the analytical facility and project needs.

6.3 UNKNOWN WASTE DETERMINATION AND COLLECTION

1. Drill cuttings/soils/slurries/decontamination fluid shall be segregated as unknown waste when the material meets the following criteria:

   a. Drilling occurs in a waste site but does not meet the criteria outlined in section 6.4.1 of this instruction; or

   b. Encountering saturated soil, perched water, or ground water that may mask accurate field readings from field screening instruments; or

   c. Any well where purge water is required to be collected as identified in purge water document 90-ERB-073.

2. Before containers of drill cuttings/soils are full, any foil, paper, gloves, etc., shall be added that accumulated in the exclusion zone while filling the container. This waste shall be collected in a separate plastic bag and placed on top of drill cuttings/soils already in the container.

   NOTE: Care shall be taken to prevent freezing of liquid waste at the Centralized Liquid Waste Container Storage Area during the winter months.

3. Decontamination fluid will be collected as unknown waste in areas where the purge water document (90-ERB-073) requires collection and testing of purge water. The collected fluid will be sampled for the constituent of concern and then managed as purge water (either disposed or treated).

6.4 SUSPECTED HAZARDOUS WASTE FIELD DETERMINATION AND COLLECTION

1. Drill cuttings/soils/slurries shall be segregated, handled, and managed as suspected hazardous waste based on process knowledge of material known to have been discharged to the area under investigation and any of the following in support of this process knowledge:

   a. Direct instrumentation reading of organic vapor in excess of 10 ppm above background levels one foot above freshly excavated soil or at the well head,

   b. pH less than three or greater than 12, or

   c. Mobile screening lab analyses exceeding established limits.

2. During the collection process, if the material no longer meets the suspected hazardous waste criteria in section 6.4.1, it shall be segregated, handled, and managed as unknown waste for the remainder of the borehole unless the criteria for suspected hazardous waste is again met. Waste shall be segregated to meet the intent of EET&P's Waste Minimization Plan (WHC-SD-WM-EV-037).

3. The words "SUSPECT HAZARDOUS" shall be written on the top and sides of containers containing suspected hazardous waste. To prevent mixing contaminated waste, only material from the same borehole should be placed in a container.

4. Before containers of drill cuttings/soils are full, any foil, paper, gloves, etc., shall be added that accumulated in the exclusion zone while filling the container. This waste shall be collected in a separate plastic bag and placed on top of drill cuttings/soils already in the container.

5. Containers must be closed except when material is being added or removed.

6.5 RADIOACTIVE WASTE/MIXED WASTE FIELD DETERMINATION AND COLLECTION

1. Drill cuttings/soils/slurries/decontamination fluid identified as radioactive shall be segregated into DOT specified drums or an approved alternate container for radioactive material.

2. Radioactive waste also suspected of containing hazardous constituents shall be handled as suspected mixed waste and segregated into DOT specified drums or an approved alternate container for mixed waste.

3. Before the container is full, any foil, paper, gloves, etc., shall be added that accumulated while filling the container in the exclusion zone and that may be contaminated from the drum contents. This waste shall be collected in a separate plastic bag and placed on top of drill cuttings/soils already in the drum.

4. Each container of radioactive and/or suspected mixed waste shall be labeled with a DOT Radioactive hazard class label and managed in accordance with this instruction.

5. Containers of radiological material shall be segregated from containers of non-radiological material.

6.6 SEALING CONTAINER

1. When the container is ready to be sealed, the opening of each plastic bag shall be twisted closed and secured with tape (when applicable). For drums, check to confirm a gasket is on the lid; then attach and secure with a locking ring and locking ring nut.

2. Footage, contents, and date filled markings shall be added to the writing on the lid.

   NOTE: For purposes of waste minimization, soils from different boreholes should not be placed in the same container. Decontamination water from different boreholes may be collected in the same container. A composite sample of decontamination water shall be taken, analyzed, and used for designation.

3. When the container is sealed, a unique container tracking number shall be obtained from the FG. The unique container number shall be entered on the IC Form and on the container lid.

4. All unknown, suspected hazardous and suspected mixed waste containers awaiting laboratory analysis shall have an IC Form completed and signed by the FTL/CE. The FTL/CE shall print the name of the FG on the IC Form. The original shall be placed in a plastic sleeve and attached to the side of the container (for drums, place between the drum ribs). The edges shall be completely taped to minimize exposure to moisture. Verification shall be made that the container number is legible on the form.

   The FTL/CE shall document any indications of contamination (organic, inorganic, radioactive) in the Comments/Suspected Hazards section of the IC Form.

   The IC form copy shall be submitted to the FG. The FG shall add their signature upon receipt.

6.7 MANAGEMENT OF WASTE CONTAINERS

Liquid waste generated at CERCLA or other past practice sites will be stored in a Centralized Liquid Waste Container Storage Area and protected from freezing as identified in section 3.0 of this procedure.

CERCLA or other past practice site solid waste shall remain at the Solid Waste Container Storage Area within the boundaries of the operable unit where the waste was generated until a site specific record of decision is reached.

6.8 FINAL DISPOSAL

Prior to assigning the container waste status (non-regulated, hazardous, mixed, etc.) for segregation purposes, the FG shall consult with SWE if questions arise on specific sample lab analyses.

Based on the sample lab analyses, waste containers shall be handled as follows:

a. The word HAZARDOUS shall be written on any containers identified as such. Solid hazardous waste shall remain in the container storage area until final remedial action. Liquid characteristically hazardous waste will either be shipped off for appropriate RCRA disposal or remain for incorporation into the final remedial action, with the decision made on a case-by-case basis, with approval from the regulators.

b. Dry soil that is not regulated as a hazardous or dangerous waste and not contaminated with radiological constituents may be disposed of at the point of generation.

c. Wet soils/slurries that are not regulated as a hazardous or dangerous waste and not contaminated with radiological constituents may be disposed of on the soil surface outside the zone of investigation.

d. The words SUSPECTED HAZARDOUS shall be removed from any <u>non-regulated</u> containers that were field-determined suspected hazardous or suspected mixed waste.

e. Decontamination fluid that is not regulated as a hazardous or dangerous waste and not contaminated with radiological constituents shall be disposed of on the soil surface outside the zone of investigation.

f. Decontamination fluid that for some unforseen circumstance cannot be protected from freezing, is contaminated with radiological constituents, but not regulated as hazardous, shall be handled per EII 4.2.

g. Any plastic bags of foil, paper, gloves, etc., included in drums of non-regulated material shall be collected and disposed of as trash (dumpster or central landfill).

6.9 REPORTING

The FG(s) shall send monthly reports to the EET&P point of contact statusing containers assigned to their group.

6.11 RECORDS

The following shall be maintained by the FG and submitted for permanent retention in accordance with EII 1.6:

1. Copy of IC form (second copy of form).
2. Container inventory reports (hard copies produced from generator waste tracking database).
3. Sample lab analyses.
4. Copy of any CWDR sent to SWE.
5. Original CWDA letter received from SWE.
6. Inspection logs for container storage areas.
7. Training records for FG.
8. Correspondence regarding management of containers.

7.0 REFERENCES

1. Atomic Energy Act of 1954.

2. 40 CFR 261, "Identification and Listing of Hazardous Waste."

3. WHC-CM-4-10, Radiation Protection.

4. WHC-CM-5-16, Hazardous Waste Management.

5. WHC-CM-7-5, Environmental Compliance, part F, "Radioactive Liquid."

6. WHC-CM-7-7, Environmental Investigations and Site Characterization.
   EII 1.6, "Records Management."
   EII 4.2, "Control of RCRA Waste."
   EII 5.2, "Soil and Sediment Sampling."
   EII 9.1, "Geologic Logging."
   EII 10.3, "Disposal of Well Construction/Development Water."

7. WHC-EP-0063-1, "Hanford Site Radioactive Solid Waste Acceptance Criteria."

8. WHC-SD-WM-EV-037, "Waste Minimization Plan - Environmental Engineering and Technology Function," 1989.

9. DOE 90-ERB-073, "Strategy for Handling and Disposing of Purge Water on the Hanford Site."

8.0 BIBLIOGRAPHY

1. DOE Order 5820.2A, "Radioactive Waste Management."

2. WHC-CM-2-14, Hazardous Material Packaging and Shipping.

3. WHC-CM-4-11, ALARA Program Manual.

WESTINGHOUSE HANFORD COMPANY

the best DOE site

OVERVIEW OF EII 4.3,

"CONTROL OF DRILLING WASTE GENERATED FROM CERCLA AND RCRA PAST PRACTICE UNITS"

We're Making Sure

CURRENT PROCEDURE FOR INVESTIGATION DERIVED WASTE

- INVESTIGATION DERIVED WASTE IS CURRENTLY MANAGED AS RCRA WASTE
  - WASTE DESIGNATION
  - 90-DAY STORAGE REQUIREMENTS
  - UNNECESSARY ADMINISTRATIVE REQUIREMENTS
- CURRENT ON-SITE STORAGE AND/OR DISPOSAL CAPABILITY IS LIMITED FOR MIXED WASTE
- EXTENSIVE COSTS ARE INCURRED

PROPOSED PROCEDURE FOR INVESTIGATION DERIVED WASTE

- UTILIZE PROCESS KNOWLEDGE TO LIMIT SOIL COLLECTION
- UTILIZE FIELD SCREENING TO LIMIT ANALYTICAL COSTS
- DEVELOP AN ALTERNATE WASTE CONTAINER
- DESIGNATE A CENTRALIZED CONTAINER STORAGE AREA
  - LIQUID WASTE MAY REQUIRE SEGREGATION OUTSIDE OF THE "OU"
  - SOLID WASTE WILL REMAIN WITHIN THE "OU" UNTIL THE REMEDIAL ACTION IS INITIATED

ADMINISTRATIVE REQUIREMENTS

- ADMINISTRATIVE REQUIREMENTS WILL BE BASED ON HEALTH AND SAFETY
  - THE 90-DAY CLOCK WILL NOT BE TRIGGERED
  - INSPECTIONS WILL BE CONDUCTED ON A MONTHLY BASIS
  - DECONTAMINATION FLUIDS WILL BE MANAGED IN ACCORDANCE WITH THE PURGE WATER AGREEMENT
  - CONTAINERS WILL BE TRACKED FOR FUTURE STORAGE OR DISPOSAL

FINAL DISPOSAL CRITERIA

- NONRADIOACTIVE/NONDANGEROUS WASTE WILL BE DISPOSED ONSITE
- HAZARDOUS AND MIXED WASTE WILL BE MANAGED IN ACCORDANCE WITH THE "ROD"
- RADIOACTIVE/NONDANGEROUS WASTE MANAGED IN ACCORDANCE WITH THE "ROD"
- DECONTAMINATION FLUIDS WILL BE MANAGED IN ACCORDANCE WITH THE PURGE WATER AGREEMENT (I.E., TREAT OR DUMP)

END RESULT OF REVISED PROCEDURE

- OBTAIN AN ARAR WAIVER FROM MOST RCRA REQUIREMENTS
  - REDUCED COST
  - REDUCED VOLUMES OF WASTE
  - PROVIDES FOR WASTE MINIMIZATION

Attachment 8

90-ERB-103

SEP 11 1990

President
Westinghouse Hanford Company
Richland, Washington

Dear Sir:

ENVIRONMENTAL RESTORATION DIVISION (ERD) SURVEILLANCE ERD-RKS-90-92

The following surveillance of Westinghouse Hanford Company (WHC) activities was conducted by ERD:

Consistency in Remedial Investigation/Feasibility (RI/FS) Study Work Plans & Work Plan Implementation Surveillance No. ERD-RKS-90-92

A copy of the surveillance report containing the observations is enclosed.

WHC is requested to respond to the report, with a copy to the Director of the Safety and Environment Division within 30 calendar days of receipt of this letter. The response shall conform to the format provided on the Contractor Surveillance Report Response form which is available as an HLAN macro. Additional formal response is required upon conclusion of the corrective actions taken. This response shall identify actions taken for each observation, with dates of completion indicated.

Please direct any questions concerning the surveillance to the surveillance report author, Mr. R. K. Stewart at 376-6192, or to Mr. Roger D. Freeberg at 376-7167.

Sincerely,

ORIGINAL SIGNED BY

R.D. Izatt

R. D. Izatt, Director
Environmental Restoration Division

ERD:RKS

Enclosure

cc w/encl:
T. M. Wintczak, WHC
M. R. Adams, WHC

bcc: ERD Off File
ERD Rdg File
RB Rdg File
File: SUR90-93.LTR & .RKS
AME Rdg File
CCC Rdg File
RK Stewart, ERD, w/encl.
File Code: 40.1.15

RECEIVED
SEP 13 1990

OFFICE > 6-7167	ERD	ERD	ERD			DOE-RL/CCC	
SURNAME >	Stewart:jh	Freeberg	Izatt				
DATE >	9/6/90	9/7/90	9/11/90				

DOE-RL SURVEILLANCE REPORT

Division: Environmental Restoration Division

Surveillor: R. K. Stewart, A5-19 **Surveillance Number:** ERD-RKS-90-92

Date: August 27, 1990

Contractor: Westinghouse Hanford Co. (WHC)

Location/Facility: 450 Hills Street, Rm. #19

Title: Consistency in Remedial Investigation/Feasibility (RI/FS) Study Work Plans & Work Plan Implementation

Subject/Scope of Surveillance:

Assess progress in WHC's development of response to EPA/Ecology-expressed concerns regarding consistency in RI/FS (RFI/CMS) Work Plans and Work Plan implementation.

Background:

At the August 15, 1990, General Topics Unit Managers' Meeting, EPA/Ecology raised a number of issues regarding consistency in Work Plans. Specifically, Ward Staubitz, a consultant for EPA, briefed attendees on consistency issues outlined in Attachment #1 (his outline). Issues briefed related to (1) inconsistencies between work plans, (2) inconsistencies in execution of work plans, and (3) inconsistencies in conceptual models contained in various work plans.

The purpose of this surveillance was to assess the progress WHC has made in developing plans to address the issues raised and to ensure that the full scope of the issues raised and suggestions made are addressed. (Because the issues were raised and are being/to be addressed does not indicate that DOE-RL and/or WHC agree fully with the points made.)

Surveillance Summary:

The surveillance was conducted in a meeting with Mel Adams, Manager of WHC's Environmental Engineering Group, and Wayne Johnson, Manager of WHC's 200/300 Areas Environmental Engineering Section.

In the meeting, items listed in the Staubitz outline (see Attachment #1) were discussed. Additionally, WHC discussed response activities underway, and provided copies of pertinent documentation (see Results below).

Surveillance Results:

WHC is making a proactive effort to address work plan and work plan implementation inconsistencies. They have recognized several inconsistency issues, but were not totally aware of (nor in agreement with) all of the issues raised in the August 15th briefing. WHC Engineering Group has transmitted an internal Memo, "Work Plan Consistency", dated August 17, 1990, to the WHC Environmental Restoration (ER) Program Office outlining inconsistencies proposed to be addressed through a funded task in the "Baseline Documents" cost account (EK113) in FY 1991 (Letter attached as "Attachment # 2 - Original File Only). Additionally, they had prepared a cost account plan for the work to be performed for this task.

The quickness and depth of this response is to be commended. However, the information discussed and/or obtained did not fully address the issues raised nor the suggestions made in the August 15th meeting.

O. 01 WHC has as yet not fully addressed the issues raised nor the suggestions presented at the August 15th meeting; these should be addressed and responded to. A suggested step in doing this is to conduct a specially-called meeting with Mr. Staubitz and others as appropriate, including EPA/Ecology. Contentious points should be identified and negotiated.

O 02. Because work scope delineated in the above referenced internal memo and planned via prepared cost account plans does not fully address items discussed and suggestions made, work scope should be revised to incorporate agreed work resulting from O. 01 (subject to funding availability).

Management Debriefed: Mel Adams
Wayne Johnson **Date:** August 27, 1990

Formal Response Required: Yes [X]
No []

Author's Signature: Robert K. Stewart **Date:** 9/11/90

Attachments: (1) Outline of Information Presented by Ward Staubitz, USGS (EPA Consultant), Regarding Consistency Problems Related to RI/FS (RFI/CMS) Work Plans at August 15, 1990, General Topics Unit Managers' Meeting

(2) Internal WHC Memo "Work Plan Consistency" (#81220-90-270) from Environmental Engineering Group to T. M. Wintczak. **(ATTACHED TO ORIGINAL FILE ONLY)**

Attachment
ERD-RKS-90-92
Surveillance

Information Presented by Ward Staubitz, USGS, Regarding
Consistency "Problems" Related to RI/FS (RFI/CMS) Work Plans

General Topics Unit Managers' Meeting, August 18, 1990

I. Problems exist:
   A. Between Work Plans
   B. In Execution of Work Plans
   C. In Conceptual Models

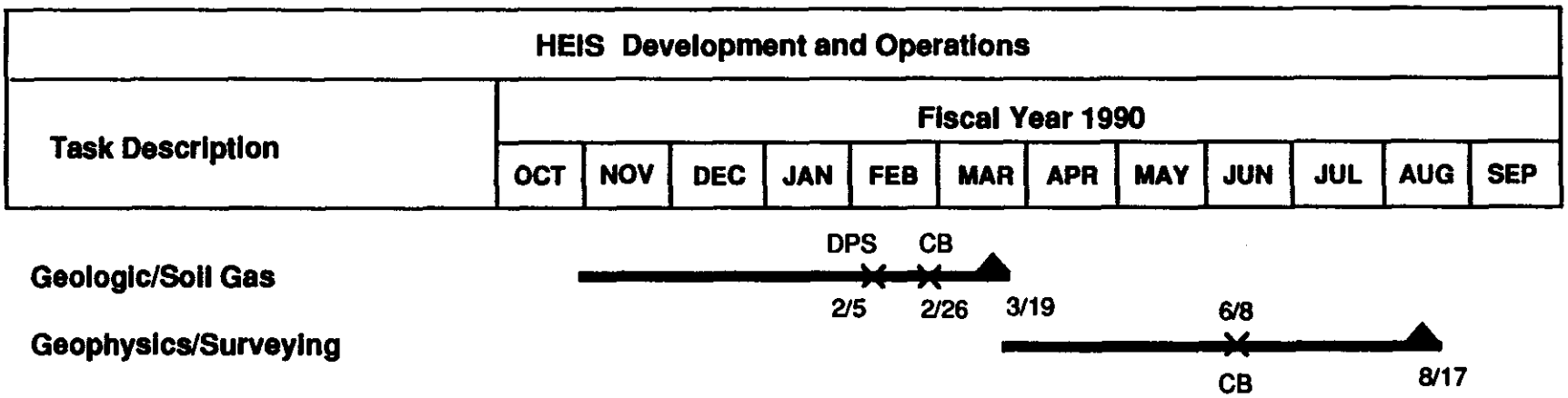
II. Between Work Plans
   A. River/Seep/Sediment Sampling
   B. Field/Laboratory Screening
   C. Drilling Through Waste Management Units
   D. Test Pit Sampling
   E. Collection of Aquifer Matrix Samples for Chemical Samples
   F. Physical Analyses of Contaminated Samples
   G. Flood-Wave and Water Level Measurements
   H. Flow and Solute Transport Models

III. Execution of Work Plans
   A. Aquifer Tests - 200-BP-1
   B. Borehole Geophysics - 200-BP-1
   C. Soil Hydraulic Properties - 200-BP-1
   D. Involvement of Performance Assessment Group
      - Flow Direction - 1100-EM-1
      - Soil Hydraulic Properties - 200-BP-1

IV. Conceptual Models
   A. Recharge - 100-BC-1
                - 100-KR-1
   B. Flow System - 1100-EM-1
   C. Future Updates

V. Suggestions for Addressing Problems
   A. Establish Quality Control Group to include:
      - WHC Environmental Engineering
      - WHC Geosciences
      - WHC Performance Assessment Group
      - Battelle Geosciences
      - Subcontractors
   B. Establish Model Working Group
      - WHC
      - Battelle
      - Subcontractors
      - EPA/Ecology Representatives
      - Invited Experts (Consultants)

Attachment 9



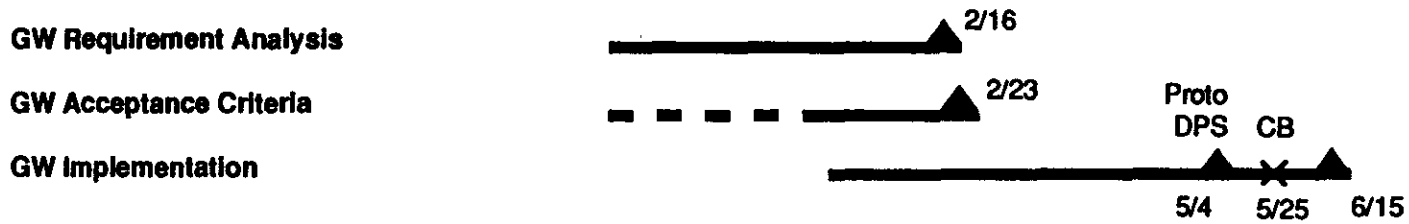
Geologic/Soil Gas

- o Completed on Schedule
- o Currently being Tested

Geophysics/Surveying

- o Revised Procedures delivered on Schedule
- o Procedures Review completed and currently responding to comments
- o On Schedule

HEIS Development and Operations												
Task Description	Fiscal Year 1990											
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP

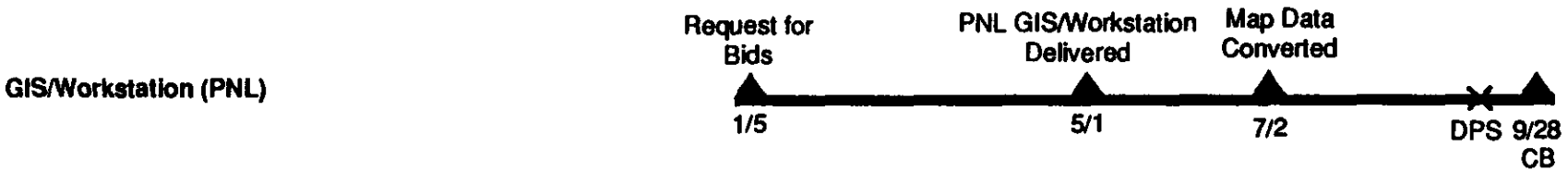


- o Completed on Schedule
- o Currently being Tested

HEIS Development and Operations												
Task Description	Fiscal Year 1990											
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP

- o Draft Procedures delivered on Schedule 5/17
- o Review Completed and currently responding to comments
- o On Schedule

HEIS Development and Operations												
Task Description	Fiscal Year 1990											
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP



- For Development
- Incorporating AutoCAD Files for 200 and 1100 Areas
- ARC/INFO has been installed
- Draft Procedures delivered on 09/10

OPERATIONAL STATUS

- o Technical Development is on Schedule
- o The following areas are currently being QA tested:
  - Log on/HELP keys/Function keys
  - Sample
  - Constituent
  - Site
  - Geologic
  - Groundwater
  - Well
- o Areas remaining to be QA tested:
  - Survey
  - Geophysics
  - Soil Gas
  - Atmospheric
  - Biota
  - GIS
- o ORACLE has been upgraded (Version 6)

Attachment 10

UNIT MANAGERS MEETING

September 19, 1990

--- TOPIC ---

ENVIRONMENTAL RESTORATION REMEDIAL ACTION (ERRA)
QUALITY ASSURANCE REQUIREMENTS DOCUMENT (QARD)

12:00 PM TO 1:00 PM

MODERATOR

ROLAND (RON) F. COTE'

WHC ENVIRONMENTAL RESTORATION PROGRAM OFFICE

ERRA QARD BACKGROUND

- Major Program with Multiple and Overlapping Quality Assurance and Quality Control Requirements Promulgated through DOE Orders and the Tri-Party Agreement

"Wherever multiple or overlapping requirements exist for similar activities, consolidation of such requirements into a single document should be effected by the program or project management in order to avoid confusion by the implementing organizations."

Leo Duffy, Keynote Address, ASQC Energy Conference
April 2, 1989, Tropicana Hotel, Las Vegas, NV

OBJECTIVES

- Uniform Interpretation of Quality Management Requirements to Serve as Cornerstone for ERRA Program
- Ensure Uniform Application of Quality Management Requirements to Work Activities
- Establish Baseline to Manage Requirements and Changes
- To Demonstrate to the Customer, Regulator(s), and Oversight Organizations How the ERRA Program Applies Their Quality Assurance Requirements in Meeting the ERRA Program Performance Objectives

APPROACH/QARD ORGANIZATION

- Used 18 Criteria of NQA-1-89 as Base in Conjunction with Other Principal Source Documents in Relation to QA Programmatic Controls
- Integrate Overlapping Requirements to Eliminate Redundency
- Source Code Each Paragraph With Source Document Reference
- Modular Design/Configuration

ENVIRONMENTAL RESTORATION REMEDIAL ACTION QUALITY ASSURANCE REQUIREMENTS DOCUMENT

PART I MANAGEMENT AND ADMINISTRATION

PART II ENVIRONMENTAL DATA OPERATIONS FOR REMEDIAL RESPONSE, NEW WASTE INSTALLATIONS, TECHNICAL DEVELOPMENT, AND ENVIRONMENTAL MONITORING

PART III DESIGN

PART IV COMPUTER SOFTWARE

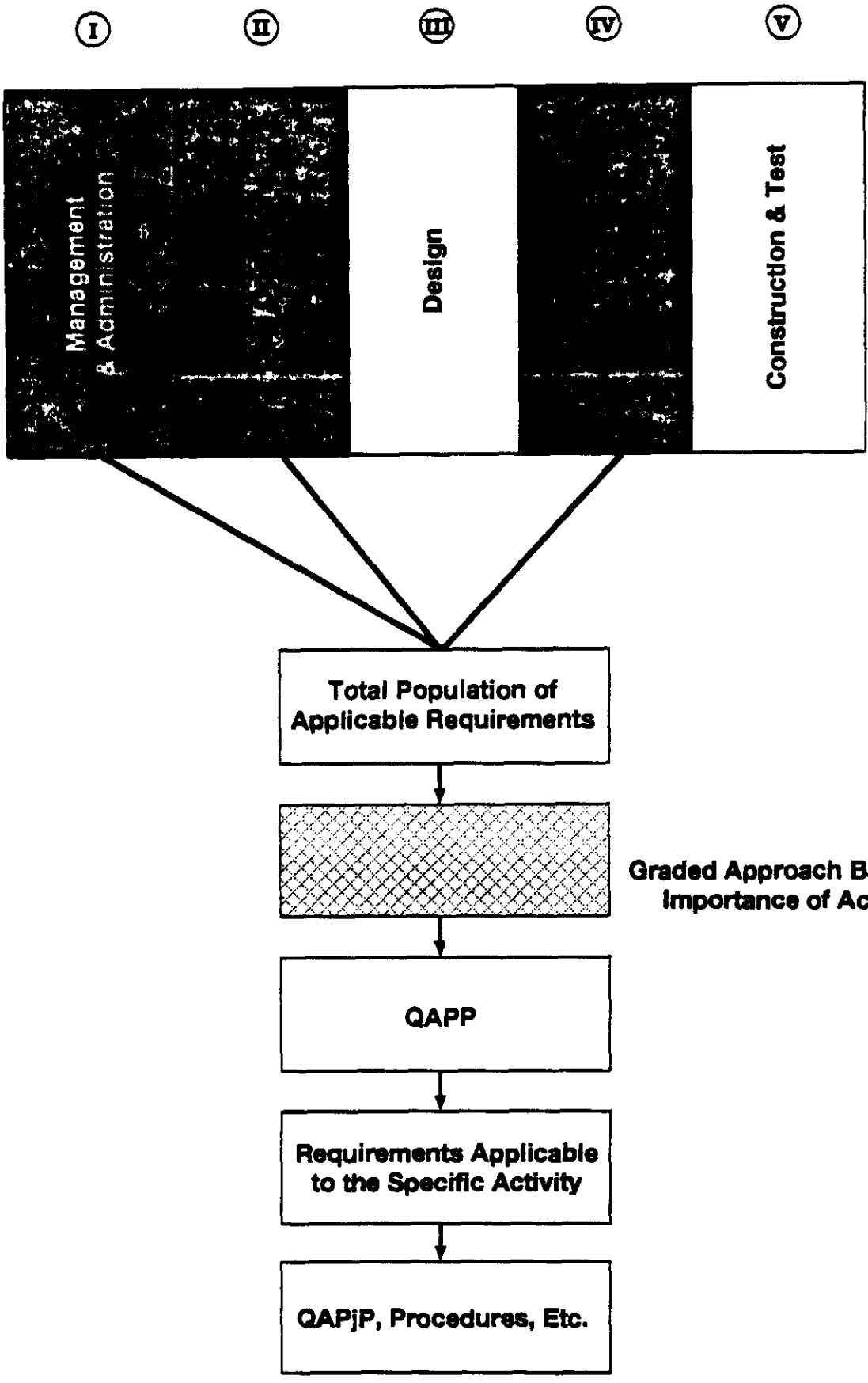
PART V CONSTRUCTION AND TEST

Overall QARD Organization 5-Part Modular Design

	I.	II.	III.	IV.	V.
	Management & Administration	**Environmental Monitoring & Data Operations**	**Design**	**Computer Software**	**Construction & Test**
Mandatory Requirements	CH 1 – Organization CH 2 – QA Program CH 4 – Procurement Document Control CH 5 – Instructions, Procedures, Plans & Drawings CH 6 – Document Control CH 7 – Control of Purchased Items & Services CH 15 – Control of Nonconforming Items CH 16 – Corrective Action CH 17 – QA Records CH 18 – Audits & Surveillances				
Additional Management and Administrative Requirements to Part I		CH 1 - Organization CH 2 - QA Program CH 5 - Instructions, Procedures, Plans & Drawings CH 6 - Document Control CH 15 - Control of Nonconforming Items & Samples CH 16 - Corrective Action CH 17 - QA Records CH 18 - Audits & Surveillances	CH 2 - QA Program CH 15 - Control of Nonconforming Items CH 16 - Corrective Action CH 17 - QA Records	CH 1 - Organization CH 2 - QA Program CH 4 - Procurement Document Control CH 5 - Instructions, Procedures, Plans & Drawings CH 15 - Control of Nonconforming Items CH 16 - Corrective Action CH 17 - QA Records	CH 2 - QA Program
Additional Requirements Unique to Part (Based on Participant's Scope of Work)		CH 3 - Design Control CH 8 - ID & Control of Items CH 9 - Control of Processes CH 10 - Inspection, Verification & Validation CH 11 - Test Control CH 12 - Control of Measuring & Test Equipment CH 13 - Handling, Storage & Shipping CH 14 - Inspection, Test & Operating Status	CH 3 - Design Control CH 8 - ID & Control of Items CH 9 - Control of Processes CH 10 - Inspection, Verification & Validation CH 11 - Test Control CH 12 - Control of Measuring & Test Equipment CH 13 - Handling, Storage & Shipping	CH 3 - Design Control CH 8 - ID & Control of Items CH 9 - Control of Processes CH 10 - Inspection, Verification & Validation CH 11 - Test Control CH 12 - Control of Measuring & Test Equipment CH 13 - Handling, Storage & Shipping CH 14 - Inspection, Test & Operating Status	CH 3 - Design Control CH 8 - ID & Control of Items CH 9 - Control of Processes CH 10 - Inspection, Verification & Validation CH 11 - Test Control CH 12 - Control of Measuring & Test Equipment CH 13 - Handling, Storage & Shipping CH 14 - Inspection, Test & Operating Status

Figure 2

Use of the QARD



QARD MANAGEMENT

- Baseline Analysis Matrix

- Provides Relationship of Principle Source Documents to QARD

- Provides Traceability of QARD Requirements to Implementing Documents

- Provides Mechanism to Respond to Changes of Principle Source Documents in Relation to the QARD and Implementing Documents

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WESTINGHOUSE HANFORD COMPANY
ERRA PROGRAM
SOURCE REQUIREMENT VALIDATION REPORT

DATE: 25 AUG 90
REPORT: SR01

DOCUMENT NUMBER: ASME NQA-1-1989
PART: B
SECTION: 1 [1]
DOCUMENT DATE: 15 SEP 89
DOCUMENT REVISION: 0-1989

DOCUMENT TITLE: QA Program Requirements for Nuclear Facilities
REQUIREMENT CATEGORY: M
STATUS CODE: IMPL
VALIDATOR CODE: WHC07 ANALYZER CODE: 03
VALIDATION DATE: 21 AUG 90
LAST AUDIT DATE:

STATUS COMMENT: Mandatory QARD Requirement

REQUIREMENT: ORGANIZATION [1 of 3]: The organizational structure, functional responsibilities, levels of authority, and lines of communication for activities affecting quality shall be documented.

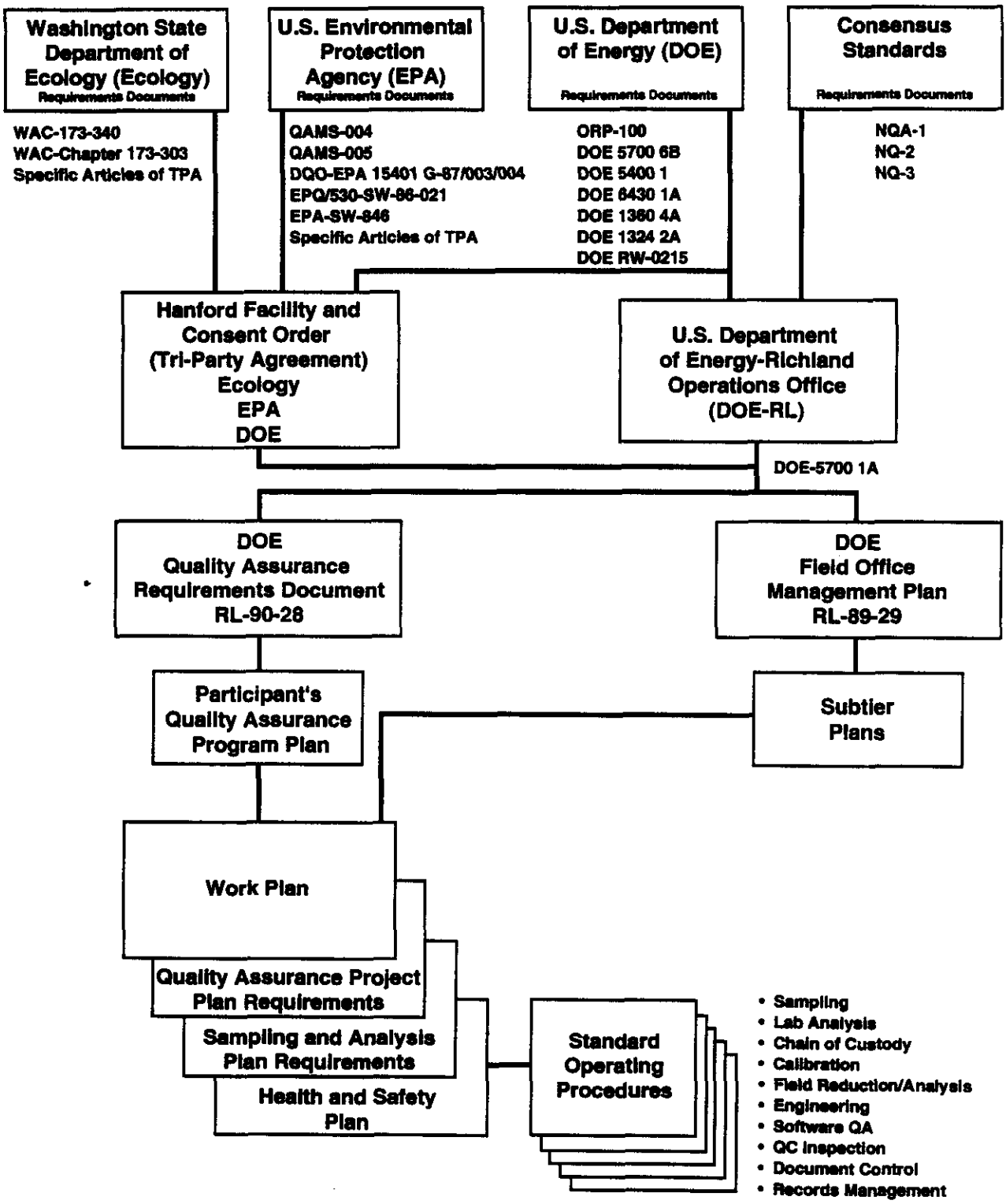
IMPLEMENTING DOCUMENT: DOE/RL-90-28
PART: I
SECTION: 1.3
DOCUMENT DATE: 01 NOV 90
DOCUMENT REVISION: 0
STATUS COMMENT: Satisfactorily implements requirement

DOCUMENT TITLE: ERRA QA Requirements Document
IMPLEMENTATION STATUS: SAT
VALIDATOR CODE: ANALYZER CODE: 04
VALIDATION DATE: LEVEL: 1
LAST AUDIT DATE:

IMPLEMENTATION: ORGANIZATION: The organizational structure, functional responsibilities, levels of authority, and lines of communication for activities affecting quality within the ERRA program shall be documented. The documentation shall include organizational charts, functional responsibilities, and descriptions. It shall also identify the external organizations, other than material or equipment suppliers, that directly support the participant's work, including the services provided.

Figure 1

Hanford Environmental Restoration Remedial Action Program Document Hierarchy



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REQUIREMENTS SOURCE DOCUMENTS AND CODE DEFINITIONS

1. **ASME/NQA-1-89**
   Quality Assurance Program Requirements for Nuclear Facilities
   September 1989
   Code - Basic
   - NQ-1-B-SEC-XX

   Code - Supplement
   - NQ-1-S-XXSX-SEC-XX

   Code - Guidance
   - NQ-1-G-XXAX-SEC-XX

2. **DOE 5700.6B**
   Quality Assurance
   September 1986
   Code
   - 5700.6B-SEC-XX

3. **DOE 5700.1A**
   Quality Assurance
   July 1983
   Code
   - RL5700.1A-SEC-XX

4. **DOE 5400.1**
   General Environmental Protection Program
   November 1988
   Code
   - 5400.1-SEC-XX

   Code - Implementation Guidance
   - 5400.1-IMP-SEC-XX

5. **Hanford Facility Agreement and Consent Order [Tri-Party Agreement (TPA)]**
   Legal and Action Plan Articles
   May 1989
   Code - Basic
   - HFACO-ART-XXX-XX

   Code - Attachment
   - HFACO-ATT-X-SEC-XX

6. **DQO-EPA/540/G-87/003 and 004**
   Data Quality Objectives for Remedial Response Activities, Development Process
   March 1987
   Code
   - DQ-3-SEC-XX
   - DQ-4-SEC-XX

7. **QAMS-004**
   Guidelines and Specifications for Preparing Quality Assurance Program Plans
   Code
   - QMS-4-SEC-XX

8. **QAMS-005/80**
   Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans
   December 1980
   Code
   - QMS-5-SEC-XX

9. **ORP-100 Draft**
   Department of Energy Environmental Restoration Onsite Remediation Program, Program Management Plan
   February 1990
   Code
   - ORP-SEC-XX

10. **DOE 6430.1A**
    General Design Criteria
    Code
    - 6430.1A-SEC-XX

REQUIREMENTS SOURCE DOCUMENTS AND CODE DEFINITIONS (continued)

11. **EPA/530-SW-86-031**
Technical Guidance Document: Construction Quality Assurance for Hazardous Waste Land Disposal Facilities
October 1986
Code
- CQA-031-SEC-XX

12. **EPA-SW-846**
Test Methods for Evaluating Solid Waste, Physical/Chemical Methods
Code
- TM-846-SEC-XX

13. **DOE 1360.4A**
Scientific and Technical Computer Software
Code
- 1360.4A-SEC-XX

14. **Chapter 173-303 WAC**
Washington State Department of Ecology, Dangerous Waste Regulations
January 1989
Code
- WAC-303-SEC-XX

15. **WAC-173-340**
Model Toxics Control Act Cleanup Regulation
Code
- MTCA-340-SEC-XX

16. **WHC-SE-EN-AP-023**
Data Quality Strategy for Hanford Site Characterization
January 1990
Code
- DQS-023-SEC-XX

17. **DOE/RL 89-29**
Environmental Restoration Field Office Management Plan
September 1989
Code
- FOMP-RL-SEC-XX

18. **ASME/NQA-3**
American National Standard, Quality Assurance Program Requirements for the Collection of Scientific and Technical Information for Site Characterization of High-Level Nuclear Waste Repositories
April 1989
Code - Basic
- NQ-3-B-SEC-XX

Code - Supplement
- NQ-3-S-XXSWX-SEC-XX

Code - Guidance
- NQ-3-G-XXAWX-SEC-XX

SUPPLEMENTAL SOURCE DOCUMENTS AND CODE DEFINITIONS

19. **ASME/NQA-2**
Quality Assurance Requirements for Nuclear Facility September 1989
Code
- NQ-2-X.X-SEC-XX

20. **NUREG-1199**
Standard Format and Content of a License Application for a Low-Level Radioactive Waste Disposal Facility Chapter 9, Quality Assurance
January 1988
Code
- NRG-1199-SEC-XX

21. **NUREG-1200**
Standard Review Plan for the Review of a License Application for a Low-Level Radioactive Waste Disposal Facility
January 1988
Code
- NRG-1200-SEC-XX

22. **NUREG-1274**
Review Process for Low-Level Radioactive Waste Disposal License Application Under Low-Level Radioactive Waste Policy Amendments Act
August 1987
Code
- NRG-1274-SEC-XX

23. **NUREG-1293**
Quality Assurance Guidance for Low-Level Radioactive Waste Disposal Facility
January 1989
Code
- NRG-1293-SEC-XX

24. **NUREG-1297**
Peer Review for High-Level Nuclear Waste Repositories
February 1988
Code
- NRG-1297-SEC-XX

25. **NUREG-1298**
Qualification of Existing Data for High-Level Nuclear Waste Repositories
February 1988
Code
- NRG-1298-SEC-XX

26. **NUREG-1383**
Guidance on the Application of Quality Assurance for Characterizing a Low-Level Radioactive Waste Disposal Site
November 1989
Code
- NRG-1383-SEC-XX

27. **SAIC Project 1-246-02-539-10**
Inactive Waste Site Study Report Appendices
September 1987
Code
- IWSS-SEC-XX

28. **NUREG-0800**
(formerly NUREG-75/087)
Quality Assurance Program Description (QAPD)
January 1990
Code
- NRG-0800-SEC-XX

29. **OCRWM QAPD-DE/RW-0215**
Office of Civilian Radioactive Waste Management Quality Assurance Program Description
April 12, 1990
Code
- OCRWM-QAPD-SEC-XX

SUPPLEMENTAL SOURCE DOCUMENTS AND CODE DEFINITIONS (continued)

30. **OCRWM QARD-DE/RW-0214**
Office of Civilian Radioactive Waste Management Quality Assurance Requirements Document
April 12, 1990
Code
- OCRWM-QARD-SEC-XX

31. **NUREG-1300**
Environmental Standard Review Plan for the Review of a License Application for a Low-Level Radioactive Waste Disposal Facility
April 1987
Code
- NRG-1300-SEC-XX

32. **NUREG-0856**
Documentation of Computer Codes for High Level Waste Management
June 1987
Code
- NRG-0856-SEC-XX

33. **NUREG/CR-4640**
Handbook of Software Quality Assurance Techniques Applicable to the Nuclear Industry
August 1987
Code
- NRG-CR4640-SEC-XX

34. **EPA Order 5360.1**
Policy and Program Responsibilities to Implement the QA Program
April 1989
Code
- EPA-5360.1-SEC-XX

35. **DOE 4700.1**
Project Management System
March 6, 1987
Code
- 4700.1-SEC-XX

36. **Blacker, Stanley M.**
Harmonization of Federal Agencies Quality Assurance Requirements 17th Annual National Energy Division Conference
Code
- BLKR-1-PG-XX

37. **Blacker, Stanley M.**
How Total Quality is Making a Difference in Decision Making at the U.S. Environmental Protection Agency
Code
- BLKR-2-PG-XX

38. **Neptune, Dean**
Streamlining Superfund Soil Studies; Using the Data Quality Objectives Process for Scoping U.S. Environmental Protection Agency QAMS
Code
- NEP-QAMS-PG-XX

39. **Juran, J. M.**
Quality Control Handbook, Third Edition
1974
Code
- JUR-SEC-XX